

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	CASE NO. 08-11904(TPA)
THAYER POWER AND COMMUNICATION	:	
LINE CONSTRUCTION COMPANY,	:	
Debtor.	:	
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THAYER POWER AND COMMUNICATION	:	
LINE CONSTRUCTION COMPANY,	:	
	:	
Movant,	:	
	:	CHAPTER 11
v.	:	
THE ANDERSON GROUP, LLC;	:	
KEYBANK, N.A.; UNITED STATES OF	:	
AMERICA, INTERNAL REVENUE	:	
SERVICE; THE COMMONWEALTH OF	:	
PENNSYLVANIA, OFFICE OF THE	:	
ATTORNEY GENERAL; AND THE	:	
OFFICIAL COMMITTEE OF UNSECURED	:	
CREDITORS,	:	
	:	
Respondents.	:	JUDGE AGRESTI
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**NOTICE OF THE STALKING HORSE BIDDER REGARDING
CURE PAYMENT TERMS
BETWEEN CERTAIN UNIONS AND THE STALKING HORSE BIDDER**

Pursuant to Section II(F) of the *Order on Expedited Motion for Approval of (I) Bidding Procedures; (II) Break-Up Fee Related to the Sale of Substantially all of the Debtor's Personal Property; (III) Form and Manner of Sale Notice*, as modified by the *Order Approving Amended Emergency Motion to (A) Compel the Production of Certain Due Diligence Material; (B) Modify Order Approving (I) Bidding Procedures; (II) Break-Up Fee Related to the Sale of Substantially All of Debtor's Personal Property; and (III) Form an Manner of Sale Notice (the "Bid Procedures Order")*, the Stalking Horse Bidder

(as defined in the Bid Procedures Order) hereby submits (as Exhibit A, attached hereto) the proposed cure arrangement terms with the respect to certain of the union contracts and the Funds (as defined in the Bid Procedures Order), which shall constitute an exhibit to Schedule 1.1(e) of the Stalking Horse Bidder's Asset Purchase Agreement, dated as of December 2, 2009 (the "APA").

Notwithstanding (a) the Stalking Horse Bidder's filing of this Notice, (b) its negotiations with any unions or the Funds, or (c) anything in or attached to this Notice, the Stalking Horse Bidder has not consented (and does not consent) to the Bid Procedures Order, as modified, and reserves all of its rights and remedies (including, but not limited to, those specified in Articles VII and IX of the APA).

Dated: February 1, 2010

Respectfully submitted,

BUCKLEY KING LPA

By: /s/ Harry W. Greenfield

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Counsel for The Anderson Group, LLC
and its nominee, the Stalking Horse
Bidder, Thayer Investments, LLC